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First, in its Motion for Stay and Petition for Reconsideration or Clarification, Ameritech provided extensive background, not only on the history of this proceeding, but on the consumer abuses to which it was directed and the panoply of legislative and regulatory responses to those abuses. Ameritech demonstrated in exhaustive detail that, from the inception of this proceeding until the issuance of the *Second Report*, the Commission and all participating parties focused exclusively on 0+ interLATA services.¹ In the face of this detailed showing, which MCI ignores, MCI's unadorned, one-sentence claim that this proceeding clearly applies to intraLATA traffic is entitled to no weight.

Second, contrary to MCI's claim, Ameritech did not assert that the BOCs are the only providers of intraLATA interstate traffic. What Ameritech did say - and what MCI could not dispute - is that the BOCs are the only providers of 0+ intraLATA interstate traffic. Since the Commission's rate disclosure requirements apply only to 0+ traffic, Ameritech was, in fact, correct when it stated that all consumers of 0+ intraLATA interstate services are already protected from rate gouging by the Commission's price cap regime.

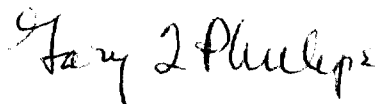
¹ A number of other parties make the identical point. See Bell Atlantic Petition at 1; BellSouth Petition at 3; and US West Petition at 5. See also Response of the Competitive Telecommunications Association to Petitions for Reconsideration at 2, which notes that "[t]hese petitions raise some meritorious arguments regarding whether intraLATA calls were ever considered part of the proposals advanced in this docket. . . ." CompTel goes on, however, to misconstrue Ameritech's Petition as seeking relief only for local exchange carrier (LEC) operator service providers (OSPs). In fact, Ameritech asked the Commission to stay application of its rules to all 0+ intraLATA services, regardless of who provides such services. Indeed, Ameritech noted that the rate disclosure requirement may have unintended anticompetitive consequences even in the interLATA market and suggested that a stay might be warranted for interLATA, as well as intraLATA services. See Petition for Stay at note 6.

2. APCC Comments

APCC takes no position on Ameritech's petitions but states that Ameritech appears to ignore the fact that the rate disclosure requirement is limited to calls from aggregator locations. Ameritech should have addressed this point in its initial petition and now provides the clarification APCC seeks.

Although the Commission limited its order to calls originating from aggregator locations, Ameritech's operator switches cannot distinguish those calls from other 0+ intraLATA calls. Although Ameritech can distinguish payphone traffic from other traffic, it cannot distinguish, for example, a call that originates from a hotel, motel, or hospital from any other call for purposes of this requirement. Thus, in order to comply with the Commission's requirement, Ameritech would have to provide the required notification on all 0+ intraLATA traffic.²

Respectfully Submitted,



Gary L. Phillips
Counsel for Ameritech
1401 H Street, N.W. #1020
Washington, D.C. 20005
(202) 326-3817

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² Indeed, as Ameritech noted in its Petitions, it also cannot distinguish at this time between intraLATA intrastate and intraLATA interstate traffic. Thus, not only would Ameritech have to provide the notification on all 0+ interstate intraLATA traffic, but also on all intrastate intraLATA 0+ traffic.

CERTIFICATE OF SERVICE

I, Toni R. Acton, do hereby certify that a copy of the foregoing Ameritech Reply has been served on the parties listed on the attached list, by First Class Mail, on this 7th day of May, 1998

By: 
Toni R. Acton

Glenn B. Manishin
Elise P.W. Kiely
Blumenfeld & Cohen
Attorneys for Gateway Technologies, Inc.
1615 M Street, NW
Suite 700
Washington, DC 20036

Mary J. Sisak
Mary L. Brown
MCI Telecommunications Corporation
1801 Pennsylvania Avenue, NW
Washington, DC 20006

Albert H. Kramer
Robert F. Aldrich
Valerie M. Furman
Dickstein Shapiro Morin & Oshinsky, LLP
Attorneys for the American Public
Communications Council
2101 L Street, NW
Washington, DC 20037-1526

Dana Frix
Kathleen L. Greenan
Swidler & Berlin, Chartered
Counsel for Cleartel Communications, Inc.,
Operator Service Company and Teltrust
Communications Services, Inc.
3000 K Street, NW
Suite 300
Washington, DC 20007

Kathryn Marie Krause
US West, Inc.
1020 19th Street, NW
Suite 700
Washington, DC 20036

John M. Goodman
Bell Atlantic Telephone Companies
1300 I Street, NW
Washington, DC 20005

Robert M. Lynch
Durward D. Dupre
Nancy Woolf
Hope E. Thurrott
Attorneys for SBC Communications Inc.,
Southwestern Bell Telephone Company,
Pacific Bell and Nevada Bell
One Bell Plaza, Room 3008
Dallas, TX 75202